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To:	All members and other interested parties
Ref:	23/046
Classification:	General Updates
Date:	21 March 2023
Subject:	**WEEKLY OTC POSITION REPORTING – CHANGES TO REPORTING METHOD AND FORMAT**

Summary

1. This Notice informs market participants that the London Metal Exchange (**"LME"**) is making changes to the method and format by which Members are required to submit weekly OTC position reports to the LME, which can be summarised as follows:

    (a) changing the method by which Members submit weekly OTC position reports to the LME from the current method of encrypted email, to submission through the LME's Universal Data Gateway (**"UDG"**); and

    (b) making certain changes to the reporting template (the **"Reporting Template"**) used by Members to submit reportable OTC positions to the LME, most of which have been necessitated by the change in the method of submission as summarised above. The LME has also determined the need to add an additional field to the Reporting Template in order to further enhance its visibility over related OTC markets.

2. To support the introduction of these changes, the LME intends to conduct a period of "parallel run", as detailed in paragraphs 14 to 17 below, during which Members are required to submit their weekly OTC position reports by both the current encrypted email method and through the UDG.

Defined terms

3. Capitalised terms not otherwise defined in this Notice shall have the meaning ascribed to them in Decision Notice 22/161, or the LME Rulebook, as the context requires.

Background

4. In Decision Notice 22/161 dated 17 June 2022, the LME announced its intention to proceed with the "Weekly OTC position reporting Proposal" which was subsequently implemented on 5 September 2022.

5. In relation to the reporting format and the proposed method by which Members are required to submit OTC reports to the LME, it was made clear in Decision Notice 22/161 that "the LME may also implement further measures where the LME considers that they could help operationalise reporting, such as setting up a mechanism to submit the data into a secure FTP server". It is in this context that the LME is making changes to the method by which Members report OTC positions.

6. Further, Regulation 24 of Part 2 of the LME Rulebook (consulted on in Notice 22/145 and adopted in Decision Notice 22/161) permits the LME, at its discretion, to modify the OTC data that Members are required to submit periodically, including to make changes to the specific data requested and the format of reports.

Changes to the Reporting Method and the Reporting Template

7. For the purposes of automating delivery, receipt, validation and feedback on Members OTC position reports, the LME will change the method of reporting from the current method of encrypted email, to

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submission through the UDG, which is the same reporting mechanism and system through which Members currently submit ETD Commodity Position Reports (**"CPR"**) and Personal Identifiable Information (**"PII"**) data.

8. Attached to this Notice at Appendix 1 is a technical document that provides the new Reporting Template and further information to assist Members in implementing the new method of submission.

9. The change to reporting through the UDG has necessitated the addition of the following three fields in the Reporting Template: "SeqNo"; "PreviousSeqNo"; and "Year". Further technical information on these fields can be found at Appendix 1.

10. An additional field, "Settlement Type", has also been added to the Reporting Template specifically to further enhance the LME's visibility over related OTC markets. It is a mandatory field and its purpose is to provide further information on the settlement of OTC positions. The field should be populated with either "CASH", where the OTC position is documented to be financially settled against a reference price, or "PHYS" where the OTC position is documented to be physically settled (even if the position is unlikely to go to delivery). Any contracts with optionality between financial or physical settlement should be booked as "PHYS".

11. Members should also note that an additional field, "Short Code", has been added to the Reporting Template. This field is to facilitate the reporting of OTC positions held by Natural Persons if such positions are required to be reported in the future.

12. In order to facilitate the automated validation checks on Member files through the UDG, Members will be required, where applicable, to make the following changes to the information that is populated in both the "Position Holder Name" and the "Position Holder LEI" fields:

    (a) where positions are reported against a legal entity which has an LEI, the "Position Holder LEI" field must be populated with the legal entity's LEI and the "Position Holder Name" field must be left blank;

    (b) where a legal entity does not have an LEI, for instance where the position holder is a non-MIFID firm, the "Position Holder Name" field must be populated with the full name of the legal entity and the "Position Holder LEI" field must be left blank; and

    (c) where positions are reported against a legal entity on an anonymised basis[1], the "Position Holder LEI" field must be left blank and the "Position Holder Name" field must be populated with the unique client identifier reference to identify the specific anonymised position holder.

13. Members are reminded that OTC positions should be submitted to the LME by no later than 14:30 (UK time) on the first Business Day of the week for positions held as at close of business the previous Business Day. Where a Member has no reportable OTC positions for the relevant period, the Member should continue to provide a weekly email confirmation.

Parallel Run

14. To support the introduction of the above changes, the LME intends to conduct a period of parallel run (the **"Parallel Run"**) which will commence on Monday 26 June 2023 (the **"Parallel Run Commencement Date"**), and which the LME expects will last for a period of ten weeks.

15. During the Parallel Run, Members are required to submit their weekly OTC position reports to the LME by both encrypted email and through the UDG. For the avoidance of doubt, Members must report using the existing Reporting Template when submitting their OTC position reports by encrypted email and using the new Reporting Template when submitting via the UDG.

16. During the Parallel Run, Members must ensure that data is consistent across both methods of reporting. The LME will also undertake weekly reconciliations of the data from each of the submission methods to establish whether Member reporting is in line with expectations.

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[1] Decision Notice 22/161 sets out, among other matters, the LME's position on client confidentiality obligations and the permissibility by Members of submitting anonymised information in OTC reports. See in particular paragraph 29(e) of the Decision Notice.

17. As noted above, it is anticipated that the Parallel Run will last for a period of ten weeks. However, the exact date on which the Parallel Run will end will be notified to Members by way of Notice in due course.

General

18. The LME would note that where a Member outsources its LME OTC position reporting to a third party service provider, it is the responsibility of the Member to immediately communicate the requirements contained in this Notice to that third party service provider.

19. If Members or market participants have any questions regarding the changes described in this Notice they should contact OTCPositionReporting@lme.com.

Peter Mason
Head of Market Surveillance

cc: Board directors
        User Committee
        All Metals Committees

Annex 1: OTC Interface Specification

OTC Reporting Template

Please respond to:
OTC Position Reporting
OTCPositionReporting@lme.com

Change History

Version	Date	Section	Section Name	Change
1.0	20 March 2023	-	-	-

Contents

OTC Reporting Template

1.1   Introduction

The LME requires Members to submit OTC Positions on a weekly basis. The OTC positions are provided on the first business date of the week for positions at the close of the previous business date. The overall flow for receiving OTC Position files will work in the same way as given in the current specification for other submission types such as Commodity Position Reports "CPR" and Personal Identifiable Information "PII" files.

1.2   SFTP Service

File transfers to and from the UDG will be delivered over the Internet and will use Secure File Transfer Protocol (SFTP). The SFTP protocol will perform validation of the user and facilitate the ability for the user to validate the SFTP server interface thereby facilitating mutual (2-way) validation of client and server.

The SFTP service is enabled either via normal authentication of using username and password or through SSH keys. With SSH keys, members would need to generate public/private key pair and provide the public key to the LME, to enable the connectivity.

Once the Member has been authenticated, the user account login will be automatically taken to the root of their directory structure to upload/download files. Files should be placed on the UDG in the appropriate sub-folder of the submitting Member inbound directory according to the data type.

Each submitting Member will only be able to view its own folders for the data types that they have been permissioned to submit.

All submissions must conform to the specified file naming conventions as the UDG uses filename pattern matching to validate incoming filenames. Filenames that do not match the expected patterns will be rejected and appropriate XML submission response file will be returned.

1.3   Folder Structure

The folder structure for each submitting Member for OTC files will follow the same format as for POS/PII files, i.e. there will be a new OTC folder under the Inbound and Outbound folders:
```
<Member Mnemonic>
        Regulatory
                Inbound
                        PII
                        Positions
                        OTC
                Outbound
                        PII
                        Positions
                        OTC
```

1.3.1   Inbound

Files sent by Members to the UDG will be placed in a sub folder of the 'Inbound' folder named according to the type of the file being sent. Files received from the Members in the inbound folders will be deleted by UDG after they have been successfully received by the LME. Members will not have permissions to delete these files.

1.3.2 Outbound

Submission response reports to Members from the UDG will be made available in a named sub-folder underneath the 'Outbound' folder. It is the responsibility of Members to delete their files from the outbound folder as soon as they have been successfully processed. Files ready for collection are made available in the appropriate sub-folder of the submitting Member's outbound directory according to the file type. The files should be retrieved using the SFTP service.

1.4   UDG OTC Submission and File Validation

Each submission file received from Members in the inbound folders will have a two-step validation process:

> 1) File naming convention
> 2) XML Schema content

If a submission fails filename validation, it will be rejected at this point and an XML submission response file will be generated in the corresponding sub-folder of the Member's outbound folder. If the submission successfully passes the first validation it will then be subject to the corresponding XML schema content validation. This should assure that the file is in the correct format, all mandatory elements present and of correct type. Similarly if the submission fails the XML Schema content validation, it will be rejected at this point and an XML submission response file will be generated in the corresponding sub-folder of the Member's outbound folder. In both cases Members will have to correct their submissions and resend them back to UDG. For partially accepted content records, only the rejected records will have to be resubmitted (see section on Error Handling later in this document).

1.5   UDG OTC Submission and Response Messages

The following tables provide information relating to the naming conventions of files submitted by members and the messages sent by the LME in response to the submission of Member OTC position reports. Having submitted a file via UDG, Members will need to poll the corresponding outbound folder for the response message.

1.5.1 Member Submitting to UDG

The Member will generate an XML file for each OTC Position Report submission.

1.5.1.1   File Naming Convention

Members will upload XML files into the 'Inbound' folder of the UDG, with the following naming convention:
<MemberMnemonic>_<FileType>_<SeqNo>-<PreviousSeqNo>-<Year>.xml

Component	Definition	Value
<MemberMnemonic>	3-character identifier of the member submitting the file to the LME.	XXX e.g. ABC
<FileType>	A 6-character attribute identifying the type of information contained within the file. For OTC position reports this will be OTCSUB.	OTCSUB – For OTC Position Reports
<SeqNo>	A 6-digit sequence number, left padded with zeroes to	NNNNNN e.g. 000001

	uniquely identify the submission to the submitter. The sequence numbers are unique to each <File_Type>. The first submission shall be 000001 and incremented for subsequent submissions. (From 999999 this will roll over to 000001) The sequence restarts each year.	
<PreviousSeqNo>	The 6-digit sequence number of the previous submission. This is used to ensure strict submission sequence processing. Note: when a submission fails and has been resubmitted with an incremented sequence number, the previous sequence number remain unchanged (last successfully processed sequence number).	NNNNNN e.g. 000000
<Year>	The last two digits of the year when the file was generated. For example for a file created during 2023, the year will be 23	NN e.g. 23

e.g.: ABC_OTCSUB_000001-000000-23

1.5.2 UDG Submitting to Member

The UDG system will generate an XML submission response file for each submission received.

1.5.2.1 File Naming Convention

The filename of the submission response XML files will comply with the following naming convention:
<MemberMnemonic>_<FileType>_<SeqNo>-<Year>.xml

Component	Definition	Value
<MemberMnemonic>	3-character identifier of the member which submitted the file to the LME.	XXX e.g. ABC
<FileType>	A 6-character attribute identifying the type of information contained within the file. For OTC position reports this will be OTCFDB.	OTCFDB – For OTC Position Reports

<SeqNo>	A 6-digit sequence number to uniquely identify the response file.	NNNNNN e.g. 000001
<Year>	The last two digits of the year when the file was generated. For example for a file created during 2023, the year will be 23	NN e.g. 23

1.5.2.2   Successful Submission

Where no errors are identified the report will advise of a successful submission. The table below describes the XML submission response file generated in UDG and placed in the corresponding 'Outbound' folders:

Component	Definition	Value
RptSts	Status of the file validated as partial validation	Always 'ACPT'
OrgnlRcrdID	Unique identifier given by the submitter unambiguously identifying the report to both, submitter and receiving competent authority.	
Sts	Status of individual record	Always 'ACPT'

1.5.2.3   Partially Successful Submission

Where errors are detected at record level the submission response will contain error references (OTC-NNN) in the XML submission response file. The table below describes the XML submission response file generated in UDG and placed in the corresponding 'Outbound' folders:

Component	Definition	Value
RptSts	Status of the file validated as partial validation	Always 'PART'
OrgnlRcrdID	Unique identifier given by the submitter unambiguously identifying the report to both, submitter and receiving competent authority.	
Sts	Status of individual record	'ACPT' or 'RJCT'
VldtnRuleID	Error Code	OTC Positions: OTC–{NNN} e.g. OTC-012
VldtnRuleDesc	Error Code Description	e.g. 'Metal code is invalid'

1.5.2.4 Unsuccessful Submission

Where errors are detected which impact the whole submission, the whole submission will be rejected with the indicated error reference in the XML submission response file. The table below describes the XML submission response file generated in UDG and placed in the corresponding 'Outbound' folders:

Component	Definition	Value
RptSts	Status of the file validated as partial validation	Always 'RJCT'
VldtnRuleID	Error Code	F–{NNN} e.g. F-001
VldtnRuleDesc	Error Code Description	e.g. 'The name of the XML file is not consistent with the naming convention'

1.6 File Structure

The following section describes the structure of the OTC data record submission files.

1.6.1 Basic Structure

OTC files are XML files that contain one or more positions.

The files contain one REPORT element which contains a single HEADER element and one or more DATA elements.

The HEADER element contains meta-data associated with the file itself.

The file then contains repeated DATA elements with the individual positions fields within each DATA element. The fields inside the data element are given in the field list section below.

1.6.2 Mandatory/Optional Field Validation

The fields which are mandatory are indicated in the field list section (where value is "M").

Where a field is mandatory then:
•   The tags for the field must be present in the XML
•   The value in the tags cannot be empty
•   The value in the tags cannot be all white space

The UDG will specifically verify these three items for mandatory fields. If a mandatory field is not present, a file will fail the overall schema validation or the generic error code OTC-008 (Mandatory Field Missing) will be returned. UDG will append the name of the missing field to this text when writing the feedback file, e.g. "Mandatory Field Missing – Business_Date".

Where a field is optional then the tags for that field can be omitted completely or the value in the tags can be empty and this will be accepted by UDG.

1.6.3 Legal Entity Identifier ("LEI") Validation

Legal Entity Identifier ("LEI") validation will take place when an LEI is reported within a Member's OTC Position Report.

An LEI will be considered as invalid in a positions records in any of the following cases:
- LEI is not found
- LEIStatus is Inactive (0) and LastRegistrationUpdateDate before BusDt
- BusDt is before InitialRegistrationDate
- RegistrationStatus is not one of the following: "Issued", "Lapsed", "Pending_Transfer" or "Pending_Archival" (case insensitive check)
- The LEI is not the LEI for the LME or LMEC.

1.6.4 OTC File Specification "Reporting Template"

The full set of fields to be extracted per DATA element and the validation required on these is outlined in the table below.

Field no	Field name	Description	Format/Validation	Mandatory (M), Optional (O), Conditional (C)	Example Data
1	UPDATE_DATE_TIME	The UTC date and time that the record was submitted for processing.	{DATE_TIME_FORMAT} ISO 8601 date and time format YYYY-MM-DDThh:mm:ss.dddddZ This date and time cannot be in the future.	M	2022-04-13T14:30:01.000000Z
2	REPORT_REFERENCE	Field to be populated with the unique identifier given by the submitter unambiguously identifying the report to both, submitter and receiving competent authority.	{ALPHANUM-52} This reference should be unique within a single file and not be repeated within a single file Any rows with the same reference as another row will be marked as RJCT. I.e. the first one found is not set as ACPT and then the later ones marked as RJCT (for	M	ABC123456789ABCDEFGHIJK AveragingUSD18052022C25000001

		being duplicates) as it is not up to UDG to determine which (if any) is the correct record.			
3	BUSINESS_DATE	Field to be populated with the date on which the reported position is held at the close of the trading day.	ISO 8601 date format YYYY-MM-DD This date cannot be in the future This date cannot be more than 5 years ago	M	2022-04-11
4	REPORT_STATUS	Indication of whether the report is new, or whether it is a cancellation or amendment of a previously submitted report. Where a previously submitted report is cancelled or amended, a report which contains all the details of the original report and using the original Report Reference Number should be sent and the 'Report status' should be flagged as 'CANC'. For amendments a new report that contains all the details of the	CHAR-4 'NEWT' - New 'CANC' – Cancellation 'AMND' – Amendment	M	NEWT

		original report and using the original Report Reference Number with all necessary details amended should be sent and the 'Report status' should be flagged as 'AMND'.			
5	MNEMONIC	The mnemonic allocated by the LME for the participant. Usually Member mnemonic but could be a non-Member mnemonic for Position Reporting.	CHAR-3 Mnemonic must be valid for the reported trading day.	M	ABC
6	POSITION_HOLDER_NAME	Full Legal Entity Name (if applicable). Should be blank where LEI or Short_Code specified. Mandatory in the event that entity is a non-MIFID legal entity. For anonymised records, should be populated with a unique reference to identify the specific anonymised entity and should be	ALPHANUM-256 At least one of the following must be populated: Position_Holder_Name Position_Holder_LEI Short_Code	C	ABC TRADING LTD

		consistent in all OTC position reporting.			
7	POSITION_HOLDER_LEI	LEI (if applicable). Should be populated for entity where entity has an LEI issued.	ALPHANUM-20 At least one of the following must be populated: Position_Holder_Name Position_Holder_LEI Short_Code	C	123456789ABCDEFGHIJK
8	SHORT_CODE	An integer code to identify natural person (if applicable). Unique 8 byte integer. Must be submitted previously reported in PII submission.	Integer At least one of the following must be populated: Position_Holder_Name Position_Holder_LEI Short_Code	C	80249131
9	METAL	Metal Code as per LME terminology i.e. AA, AH, CA, CO, NA, NI, PB, SN, ZS	CHAR-2 The Metal must be valid for the reported trading day.	M	NI
10	CONTRACT_TYPE	Type of OTC contract. Can be one of: "AVRG" - Averaging "SWAP" - Swap "INDX" - Index "PHYS" - Physical "OPTN" - Option "OTHR" - Other	CHAR-4 XML Schema validation	M	SWAP

11	CONTRACT_DESCRIPTION	Description of OTC product.	ALPHANUM-256 If Contract Type = 'OTHR' then field must be populated	C	BulletSwap
12	SETTLEMENT_TYPE	Settlement Type - "CASH" or "PHYS". Whereby, "CASH" is where the OTC position is documented to be financially settled against a reference price. "PHYS" is where the OTC position is documented to be physically settled (even if it the position is unlikely to go to delivery). Any contracts with optionality between financial or physical settlement should be booked as "PHYS".	CHAR-4 XML Schema validation	M	CASH
13	CURRENCY	Currency of position ISO code, e.g. USD	CHAR-3 XML Schema validation	M	USD
14	AVERAGING_FROM	Start date of averaging (if applicable)	ISO 8601 date format YYYY-MM-DD	C	2022-04-01

			Must be populated where Contract_Type is AVRG XML Schema validation		
15	AVERAGING_TO	End date of averaging (if applicable)	ISO 8601 date format YYYY-MM-DD Must be populated where Contract_Type is AVRG XML Schema validation	C	2022-04-30
16	PROMPT	Date of delivery/expiration	ISO 8601 date format YYYY-MM-DD Must be same or after the Business Date	M	2022-05-18
17	OPTION_SUB_TYPE	Option type "C" = Call; "P" = Put Leave blank if not applicable	CHAR-1 Must be populated if Contract_Type is OPTN Must not be populated if Contract_Type is not OPTN	C	C
18	STRIKE_PRICE	Strike of option Leave blank if not applicable Dollar equivalent where currency is not USD. Round to nearest whole number	WHOLE NUMBER Must be populated if Contract_Type is OPTN Must not be populated if Contract_Type is not OPTN	C	25000
19	POSITION	Position in metric tonnes. Negative for short position. Positive	WHOLE NUMBER	M	1500

		for long position. Round to nearest whole number			
20	DELTA_POSITION	For option positions, the delta equivalent quantity of the position (in metric tonnes) reported in the Position field. Round to nearest whole number	WHOLE NUMBER Must be populated if Contract_Type is OPTN Must not be populated if Contract_Type is not OPTN	C	1500

1.6.5 OTC XML Schema example

```xml
<?xml version="1.0" encoding="UTF-8"?>
<REPORT>

<HEADER>
    <MEMBER_MNEMONIC>ABC</MEMBER_MNEMONIC>
    <FILE_TYPE>OTCSUB</FILE_TYPE>
    <SEQ_NO>000001</SEQ_NO>
    <PREVIOUS_SEQ_NO>000000</PREVIOUS_SEQ_NO>
    <YEAR>23</YEAR>
</HEADER>

<DATA>
    <UPDATE_DATE_TIME>2023-01-30T09:48:50.047053Z</UPDATE_DATE_TIME>
    <REPORT_REFERENCE>ABC12334343</REPORT_REFERENCE>
    <BUSINESS_DATE>2023-01-27</BUSINESS_DATE>
    <REPORT_STATUS>NEWT</REPORT_STATUS>
    <MNEMONIC>ABC</MNEMONIC>
    <POSITION_HOLDER_NAME></POSITION_HOLDER_NAME>
    <POSITION_HOLDER_LEI>123456789ABCDEFGHIJK</POSITION_HOLDER_LEI>
    <SHORT_CODE></SHORT_CODE>
    <METAL>AH</METAL>
    <CONTRACT_TYPE>SWAP</CONTRACT_TYPE>
    <CONTRACT_DESCRIPTION></CONTRACT_DESCRIPTION>
    <SETTLEMENT_TYPE>CASH</SETTLEMENT_TYPE>
    <CURRENCY>USD</CURRENCY>
    <AVERAGING_FROM></AVERAGING_FROM>
    <AVERAGING_TO></AVERAGING_TO>
    <PROMPT>2023-02-28</PROMPT>
    <OPTION_SUB_TYPE></OPTION_SUB_TYPE>
    <STRIKE_PRICE></STRIKE_PRICE>
    <POSITION>100</POSITION>
    <DELTA_POSITION></DELTA_POSITION>
</DATA>

</REPORT>
```

1.7 File Validation Rules

There will be a feedback file for the OTC data files in the same format as for POS and PII, i.e. an OTCFDB file.

1.7.1 File Error Codes

The file status codes are the same as for other file types and are:

Id	Definition
F-001	The name of the XML file is not consistent with the naming convention
F-002	File has already been submitted once
F-003	Previous sequence number was not the last sequence number processed
F-004	The corresponding file for the previous file sequence number has not been received.
F-005	The file structure does not correspond to the XML schema. Error in ReportRefNo:[1] Field: [2]
F-006	The sequence number is lower than the last sequence number processed (x)
F-007	The file is not in a valid XML format. Error at Line:[3] Message:[4]

[1] is substituted with the actual ReportRefNo of the record in error, e.g. 123456
[2] is substituted with the field that contained the error, e.g. RptEnt
[3] is substituted with the line number of the error as reported by the XML parser
[4] is substituted with the error text given by the XML parser

1.7.2 Record Error Codes

The set of record error codes will be as follows:

Id	Definition
OTC-001	The date of report submission cannot be a future date
OTC-002	The date of the business date cannot be a future date
OTC-003	The date of the business date cannot be more than five years old
OTC-004	The value (NEWT) in the Report Status field is invalid
OTC-005	The value (AMND) in the Report Status field is invalid
OTC-006	The value (CANC) in the Report Status field is invalid
OTC-007	The Report reference number (ReportRefNo) should be unique within the file
OTC-008	Mandatory field missing
OTC-009	Invalid member mnemonic
OTC-010	The LEI of the position holder is invalid or is not valid for the business date
OTC-011	One of short code, position holder name or LEI must be populated
OTC-012	Metal code is invalid
OTC-013	The Contract Description field must be populated where the Contract Type is OTHR
OTC-014	Prompt cannot be before business date

OTC-015	The Option Sub Type field must be populated where the Contract Type is OPTN
OTC-016	The Strike field must be populated where the Contract Type is OPTN
OTC-017	The Delta Position field must be populated where the Contract Type is OPTN
OTC-018	Timeout System Error. Please resubmit record
OTC-019	The Option Sub Type field is not permitted if Contract Type is not OPTN
OTC-020	The Strike field is not permitted where the Contract Type is not OPTN
OTC-021	The Delta Position field is not permitted where the Contract Type is not OPTN
OTC-022	The Averaging From field must be populated where the Contract Type is AVRG
OTC-023	The Averaging To field must be populated where the Contract Type is AVRG

Notes:

• Any field that is a required field that is missing will result in OTC-008 with the name of the field appended to the "Mandatory field missing" text

• There are not specific error codes for where items fail schema validation such as where the value in a field is not one of the specified values, e.g. if option sub type was not one of "C" or "P" this would fail schema validation

1.8   Frequency, availability

Each Member will provide the LME with a single OTC file at the scheduled times below:

Mandatory – Weekly file provided by 14:30 (UK time) on the first business date of the week for positions as at close of business the previous business date.

Optional – Amendments to the OTC submission in the event of an error.

More than one file can be processed in a day if required, e.g. if a participant has been omitted or wrongly advised in error.